

GOODWIN PROCTER LLP  
53 State Street  
Boston, Massachusetts 02109  
Telephone: (617) 570-1000  
Facsimile: (617) 523-1231  
Daniel M. Glosband  
Email: dglosband@goodwinprocter.com  
David J. Apfel  
Email: dapfel@goodwinprocter.com  
(*pro hac vice* application pending)  
Brenda R. Sharton  
Email: bsharton@goodwinprocter.com  
(*pro hac vice* application pending)  
Larkin M. Morton  
Email: lmorton@goodwinprocter.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF APPEARANCE AND  
DEMAND FOR SERVICE OF DOCUMENTS**

PLEASE TAKE NOTICE that the undersigned appears in the above-captioned case on behalf of Jeffrey A. Berman, Russell deLucia, Ellenjoy Fields, Michael C. Lesser, Norman E.

Lesser Rev. 11/97 Rev. Trust, Paula E. Lesser 11/97 Rev. Trust and Jane L. O'Connor as Trustee of the Jane O'Connor Living Trust, creditors and parties-in-interest, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, section 1109(b) of the Bankruptcy Code, and Local Rule 2090-1(a) of the United States Bankruptcy Court in the Southern District of New York and demands that all notices given or required to be given and all papers served in this case be delivered to and served upon the party identified below at the following address:

GOODWIN PROCTER LLP  
Larkin M. Morton  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018  
Email: lmorton@goodwinprocter.com  
Telephone: (212) 813-8800  
Facsimile: (212) 355-3333

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints, or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in this case.

This Notice of Appearance and any subsequent appearance, pleading, claim or suit is not intended nor shall be deemed to waive Creditors': (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to a trial by jury in any proceedings so triable herein or in any case, controversy, or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; and (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Creditors are or may be entitled under agreements, in law, or in equity, all

of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: Boston, Massachusetts  
November 13, 2009

**GOODWIN PROCTER LLP**

By: /s/ Larkin M. Morton

Larkin M. Morton  
Email: lmorton@goodwinprocter.com  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018  
Telephone: (212) 813-8800  
Facsimile: (212) 355-3333

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Telephone: (617) 570-1000  
Facsimile: (617) 523-1231

*Attorneys for Jeffrey A. Berman, Russell deLucia, Ellenjoy Fields, Michael C. Lesser, Norman E. Lesser Rev. 11/97 Rev. Trust, Paula E. Lesser 11/97 Rev. Trust and Jane L. O'Connor as Trustee of the Jane O'Connor Living Trust*